

LAW OFFICES OF  
**MICHAEL K. CHONG LLC**  
**1250 BROADWAY 36<sup>TH</sup> FL, SUITE 300**  
**NEW YORK, NEW YORK 10001**  
**(212) 726-1104 FAX (212) 726-3104**

WWW.MKCLAWGROUP.COM

MICHAEL K. CHONG ‡

‡ MEMBER, NJ BAR, U.S.D.C. NEW JERSEY  
SDNY, NEW YORK  
EDNY, NEW YORK  
U.S.C.A. 2ND CIRCUIT

FORT LEE:  
2 EXECUTIVE DRIVE, STE. 720  
FORT LEE, NEW JERSEY 07024  
(201) 708-6675 FAX (201) 708-6676

*\* Please Reply to: FORT LEE*

HOBOKEN:  
300 HUDSON STREET, STE. 10  
HOBOKEN, NEW JERSEY 07024  
(201) 203-7476 FAX (201) 708-6676

DIRECT DIAL: (201) 947-5200  
EMAIL: MKC@MKCLAWGROUP.COM

January 19, 2017

Via ECF; Total Pages: 1

Honorable Gabriel W. Gorenstein, U.S.M.J.  
U.S. District Court  
500 Pearl Street  
New York, NY 10007

Re: Maldonado et al v. El Aguila Lex, LLC et al  
Case No.: 1:15-cv-09306-AJN

Dear Judge Gorenstein:

This office formerly represented Defendants in the above referenced matter. Your Honor granted our application to withdraw as counsel on October 14, 2016. In our application to withdraw as counsel, one of the primary reasons was Defendants failure to pay their outstanding legal bill. A collection lawsuit has been filed, however, Defendants are seeking to evade process.

As this matter is still pending before Your Honor, I respectfully request in follow up to our motion to withdraw as counsel which Your Honor granted, that an in person conference is held where Defendants, and specifically the individual owners Pedro and Fernando Matar are required to appear to address this remaining issue. In the alternative, Pedro and Fernando Matar can agree to acknowledge service of the collection Complaint.

Thank you for your kind courtesies in addressing this matter.

Respectfully submitted,

*Michael K. Chong*

Michael K. Chong, Esq.

MKC/  
cc: All counsel via ECF